

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	Jared K Fitzgerald Jacquelyn J Fitzgerald aka Jacquelyn Landolfi, Debtors	Case No: 20-13369-elf  Chapter: 13  Judge: Eric L. Frank
	Jared K Fitzgerald Jacquelyn J Fitzgerald aka Jacquelyn Landolfi, Movant  v.  Rushmore Loan Management Services, LLC as servicer for U.S. Bank National Association not in its individual capacity but solely as Legal Title Trustee for RMT Trust, Series 2021 BKM-TT-V Kenneth E. West – Trustee, Respondents	
		<p><b>SETTLEMENT STIPULATION RESOLVING CREDITOR, RUSHMORE LOAN MANAGEMENT SERVICES, LLC AS SERVICER FOR U.S. BANK NATIONAL ASSOCIATION NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS LEGAL TITLE TRUSTEE FOR RMT TRUST, SERIES 2021 BKM-TT-V'S LIMITED OBJECTION TO DEBTOR'S MOTION TO SELL PROPERTY</b></p>

AND NOW, upon the Motion of Debtors, Jared K Fitzgerald and Jacquelyn J Fitzgerald aka Jacquelyn Landolfi (the “Debtor”) for Sale of the Property located at 3711 Green Ridge Road, Furlong, PA 18925 (the “Property”), and the Limited Objection of Creditor, Rushmore Loan Management Services, LLC as servicer for U.S. Bank National Association not in its individual capacity but solely as Legal Title Trustee for RMT Trust, Series 2021 BKM-TT-V (the “Creditor”), it is hereby agreed as follows:

1. Debtor has entered into an Agreement of Sale for the sale of the Property for the amount of \$997,700.00.

2. The current payoff amount to pay Creditor's loan in full is approximately \$600,452.83, good through May 13, 2022. Should the sale of the Property not take place on or before May 13, 2022, Debtor shall request an updated payoff amount from Creditor.

3. Creditor's Claim shall be paid in full from the proceeds of the sale of the Property, absent further Order of the Court.

4. The parties request that this Honorable Court approve this Stipulation.

Dated: May 4, 2022

/s/ Lauren M. Moyer

Lauren M. Moyer, Esquire  
Friedman Vartolo, LLP  
1325 Franklin Avenue, Suite 160  
Garden City, New York 11530  
*Attorney for Creditor*

Dated: May 4, 2022

Brad J. Sadek

Brad J. Sadek, Esquire  
Sadek and Cooper  
1315 Walnut Street  
Suite 502  
Philadelphia, PA 19107  
*Attorney for Debtor*

Dated: May 10, 2022

/s/ LeRoy W. Etheridge, Esq., for \*

KENNETH E. WEST  
Office of the Chapter 13 Standing Trustee  
1234 Market Street - Suite 1813  
Philadelphia, PA 19107  
*Chapter 13 Trustee*

\* The Chapter 13 Trustee has no objection to the terms of the herein Stipulation, without prejudice to any of the Chapter 13 Trustee's rights and remedies.